

**From:** James Winton <svcenturion@outlook.com>

**Sent:** Monday, November 4, 2024 4:27 PM

**To:** J. Stephen Simms <jssimms@simmsshowers.com>; 'Lyons, Jeffrey J.' <jjlyons@bakerlaw.com>

**Cc:** 'Currier, Anna E.' <Anna.Currier@blankrome.com>; 'Cain, Zachary' <zachary.cain@blankrome.com>;

'Shoemaker, Douglas' <douglas.shoemaker@blankrome.com>; 'Wilgus, Lauren'

<lauren.wilgus@blankrome.com>; 'thouseal@ycst.com' <thouseal@ycst.com>;

'bchapple@reedsmith.com' <BChapple@reedsmith.com>; 'Ventre, Ginevra F.'

<GVentre@ReedSmith.com>; 'Mawere, Natsayi' <NMawere@reedsmith.com>; Debra M. Hnat

<dhnat@simmsshowers.com>; Catherine M. Benson <cmbenson@simmsshowers.com>; Gary C. Murphy

<gcmurphy@simmsshowers.com>; 'Natasha Revell' <nrevell@zalkinrevell.com>

**Subject:** RE: Cockett v. Bravo - meet and confer, this Wednesday 11/6 9:30A

Steve, you are misremembering our conversation; I'm quite certain that I didn't forget, misremember or misstate whether we had already made this move. I think you are confusing this move with a statement that we have had a house in the Solomons, Maryland area for the last few years. That is not this move.

And Tasha's request for an extension was contained in the same email that transmitted the settlement outline. Nalex responded within a couple of hours but we were unable to reach counsel for Cockett by email or phone on Friday.

*Jim*

[svcenturion@outlook.com](mailto:svcenturion@outlook.com)

**From:** J. Stephen Simms <jssimms@simmsshowers.com>

**Sent:** Monday, November 4, 2024 2:32 PM

**To:** 'Lyons, Jeffrey J.' <jjlyons@bakerlaw.com>

**Cc:** 'Currier, Anna E.' <Anna.Currier@blankrome.com>; 'Cain, Zachary' <zachary.cain@blankrome.com>;

'Shoemaker, Douglas' <douglas.shoemaker@blankrome.com>; 'Wilgus, Lauren'

<lauren.wilgus@blankrome.com>; 'thouseal@ycst.com' <thouseal@ycst.com>;

'bchapple@reedsmith.com' <BChapple@reedsmith.com>; 'Ventre, Ginevra F.'

<GVentre@ReedSmith.com>; 'Mawere, Natsayi' <NMawere@reedsmith.com>; Debra M. Hnat

<dhnat@simmsshowers.com>; Catherine M. Benson <cmbenson@simmsshowers.com>; Gary C. Murphy

<gcmurphy@simmsshowers.com>; 'James Winton' <svcenturion@outlook.com>; 'Natasha Revell'

<nrevell@zalkinrevell.com>

**Subject:** Cockett v. Bravo - meet and confer, this Wednesday 11/6 9:30A

Jeff, Thanks, I will be serving as an election judge from about 5A to 10P tomorrow 11/5 and so not able to participate in a conference tomorrow.

Yes, Tasha told me for the first time late this (Monday 4<sup>th</sup>) morning, about Jim moving. That was the first mention I'd heard of this – how long has Jim known, that he'd be moving this week so out of pocket including to meet the Court's deadline set last week? There was no mention no that during our meet and confer exchanges, either. When Jim and I first spoke, Jim told me that he already had moved with his wife/Chris' Mom, and was living at Solomon's Island (Maryland).

**Exhibit A**

Let's meet and confer Wednesday morning, the 6<sup>th</sup> at 9:30A. Please let me know the best number to reach you, then – or – if 9:30A doesn't work Wednesday morning, please let me know of a time Wednesday after then that works for you.

Best Regards, Steve

**J. Stephen Simms | SIMMS SHOWERS LLP**

D: +1 443-290-8704 | M: +1 410-365-6131

[jssimms@simmsshowers.com](mailto:jssimms@simmsshowers.com) | [www.simmsshowers.com](http://www.simmsshowers.com)

**From:** Lyons, Jeffrey J. <[jjlyons@bakerlaw.com](mailto:jjlyons@bakerlaw.com)>

**Sent:** Monday, November 4, 2024 3:18 PM

**To:** J. Stephen Simms <[jssimms@simmsshowers.com](mailto:jssimms@simmsshowers.com)>; James Winton <[svcenturion@outlook.com](mailto:svcenturion@outlook.com)>;

Natasha Revell <[nrevell@zalkinrevell.com](mailto:nrevell@zalkinrevell.com)>

**Cc:** Currier, Anna E. <[Anna.Currier@blankrome.com](mailto:Anna.Currier@blankrome.com)>; Cain, Zachary <[zachary.cain@blankrome.com](mailto:zachary.cain@blankrome.com)>;

Shoemaker, Douglas <[douglas.shoemaker@blankrome.com](mailto:douglas.shoemaker@blankrome.com)>; Wilgus, Lauren

<[lauren.wilgus@blankrome.com](mailto:lauren.wilgus@blankrome.com)>; [thouseal@ycst.com](mailto:thouseal@ycst.com); [bchapple@reedsmith.com](mailto:bchapple@reedsmith.com); Ventre, Ginevra F.

<[GVentre@ReedSmith.com](mailto:GVentre@ReedSmith.com)>; Mawere, Natsayi <[NMawere@reedsmith.com](mailto:NMawere@reedsmith.com)>; Debra M. Hnat

<[dhnat@simmsshowers.com](mailto:dhnat@simmsshowers.com)>; Catherine M. Benson <[cmbenson@simmsshowers.com](mailto:cmbenson@simmsshowers.com)>; Gary C. Murphy

<[gcmurphy@simmsshowers.com](mailto:gcmurphy@simmsshowers.com)>

**Subject:** RE: Cockett v. Bravo - counter-offer; Court's November 8th deadline

Steve,

I wrote solely in regards to our requested extension of time for Bravo to file its motions. Bravo believes it makes little sense to continue drafting its motions with the potential of settlement, especially given the lack of prejudice arising from a short extension and the wasted effort in continued drafting if a settlement is reached this week. Also, Mr. Winton is moving this week, and that move will substantially interfere with his ability to work on the motions.

Given the circumstances, absent your agreement, Bravo intends to move for a two-week extension from the court. Please advise if you will agree to this shortened extension. If not, pursuant to D. Del. LR 7.1.1, please provide your availability for a meet and confer tomorrow (11/5).

@Nalex and Wells Fargo counsel, please advise if you oppose a two-week extension of the time for Bravo to file its motions. If you oppose, please also let me know your availability for a meet and confer.

Thanks,

Jeff

**Jeffrey J. Lyons**

He | Him | His

Associate

**BakerHostetler**

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Admitted in Delaware; not admitted in Pennsylvania

From: J. Stephen Simms <[jssimms@simmsshowers.com](mailto:jssimms@simmsshowers.com)>  
Sent: Monday, November 4, 2024 11:40 AM  
To: Lyons, Jeffrey J. <[jjlyons@bakerlaw.com](mailto:jjlyons@bakerlaw.com)>; James Winton <[svcenturion@outlook.com](mailto:svcenturion@outlook.com)>; Natasha Revell <[nrevell@zalkinrevell.com](mailto:nrevell@zalkinrevell.com)>  
Cc: Currier, Anna E. <[Anna.Currier@blankrome.com](mailto:Anna.Currier@blankrome.com)>; Cain, Zachary <[zachary.cain@blankrome.com](mailto:zachary.cain@blankrome.com)>; Shoemaker, Douglas <[douglas.shoemaker@blankrome.com](mailto:douglas.shoemaker@blankrome.com)>; Wilgus, Lauren <[lauren.wilgus@blankrome.com](mailto:lauren.wilgus@blankrome.com)>; thouseal@ycst.com; bchapple@reedsmith.com; Ventre, Ginevra F. <[GVentre@ReedSmith.com](mailto:GVentre@ReedSmith.com)>; Mawere, Natsayi <[NMawere@reedsmith.com](mailto:NMawere@reedsmith.com)>; Debra M. Hnat <[dhnat@simmsshowers.com](mailto:dhnat@simmsshowers.com)>; Catherine M. Benson <[cmbenson@simmsshowers.com](mailto:cmbenson@simmsshowers.com)>; Gary C. Murphy <[gcmurphy@simmsshowers.com](mailto:gcmurphy@simmsshowers.com)>  
Subject: Cockett v. Bravo - counter-offer; Court's November 8th deadline

[External Email: Use caution when clicking on links or opening attachments.]

Tasha, Jim, Jeff,

Tasha, Thanks for the Bravo potential settlement outline. Cockett counter-offers as follows:

[REDACTED]

This all is straightforward and the parties should be able to agree today – Wednesday latest. Cockett does not agree to further delay and so if there can't be settlement by/before this Friday, 8<sup>th</sup> Bravo should file its motions.

Bravo and Nalex sides, please confirm your agreement to the above. Wells Fargo side, Cockett continues to understand that Wells Fargo is a neutral third party in all of this so no Wells Fargo response needed.

Best Regards, Steve

**J. Stephen Simms | SIMMS SHOWERS LLP**

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# ZalkinRevell, PLLC Attorneys

2078 US Highway 98W, Suite 105A, #110 • Santa Rosa Beach, FL 32459



November 1, 2024

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Simms Showers LLP  
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Lauren B. Wilgus  
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1271 Avenue of the Americas  
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**VIA EMAIL [lauren.wilgus@blankrome.com](mailto:lauren.wilgus@blankrome.com)**

**Exhibit B**

Jeffrey J. Lyons, Esq.  
Baker & Hostetler LLP  
1201 North Market Street, Suite 1407  
Wilmington, DE 19801  
VIA EMAIL [jjlyons@bakerlaw.com](mailto:jjlyons@bakerlaw.com)

James C. Winton, Esq.  
2785 Spout Lane  
Lusby, MD 20657  
VIA EMAIL [svcenturion@outlook.com](mailto:svcenturion@outlook.com)

**Re: Confidential Settlement Proposal**  
**Our Client: Bravo Global Supply LLC**

**Disputed Matter: Cockett Marine Oil US, Inc. v.**  
**Bravo Global Supply LLC, and Great Lakes**  
**Dredge and Dock Company LLC, Wells Fargo,**  
**N.A., Garnishees, C.A. No. 1:24-cv-00640-MN,**  
**Rule 9(h) pending in the US District Court for the**  
**District of Delaware, including claims of Non-**  
**Party Nalex Energy, LLC (the “Delaware**  
**Garnishment Case”)**

Dear Counsel:

Our office has been retained as counsel to Bravo Global Supply LLC (the “Debtor” or “Bravo”) to assess a potential bankruptcy filing for Bravo Global Supply LLC in the Northern District of Florida. Before undertaking such a filing, however, the Debtor has requested that our office explore a potential settlement/resolution of the disputes involved in the Delaware Garnishment Case, which resolution could avert the imminent necessity of a bankruptcy filing.

To that end, I am authorized to submit the following terms of a proposed global settlement for your consideration, with the understanding that this is an outline of terms contingent upon being reduced to a formal written settlement agreement, agreed to and executed by all parties.

- Summary of Procedural Status of the Delaware Garnishment Case
  - At issue in the Delaware Attachment Case is \$291,587.06 in the Debtor's Wells Fargo bank account (the “Wells Fargo Funds”) which are presently “frozen” by Wells Fargo due to the filing of the Delaware Garnishment Case by creditor Cockett Marine Oil US, Inc. (“Cockett”)
  - Pending in the Delaware Garnishment Case is a motion filed by Nalex Energy, LLC (“Nalex”) to vacate the garnishment on the grounds that Nalex has a claim to the Wells Fargo Funds superior to the claim of Cockett



- The Debtor intends to file, by November 8, 2024, as ordered by the Court, its motion seeking to set aside a default against the Debtor as well as a motion under Supplemental Rule E(4)(f) to vacate the attachment and dismiss the action for lack of jurisdiction
- The Debtor, Cockett and Nalex shall collectively be referred to, herein, as the "Parties."
- Proposal for Resolution

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

- If the Parties are able to come to agreement on the material terms of settlement, then the Parties shall jointly move the Delaware Court to stay the litigation for thirty (30) days to allow the Parties sufficient time to reduce the agreement to a formal settlement document and stipulation.

Please review the above proposed terms and advise the undersigned as to your client's position and/or potential comments to the structure set forth above. We look forward to working with all of you in a hopeful resolution of this matter that will provide the greatest preservation of the Debtor's assets for the benefit of both Cockett and Nalex at this juncture.

With Kindest Regards,

ZALKIN REVELL, PLLC



Natasha Revell, Esq.  
Counsel to Bravo Global  
Supply, LLC

**From:** J. Stephen Simms  
**Sent:** Thursday, October 24, 2024 8:31 PM  
**To:** 'James Winton' <svcenturion@outlook.com>; 'nrevell@zalkinrevell.com' <nrevell@zalkinrevell.com>  
**Cc:** 'Lyons, Jeffrey J.' <jjlyons@bakerlaw.com>; Debra M. Hnat <dhnat@simmsshowers.com>; Gary C. Murphy <gcmurphy@simmsshowers.com>; Catherine M. Benson <cmbenson@simmsshowers.com>  
**Subject:** Cockett v. Bravo - Thanks - Tasha, please phone

Jim, Tasha,

Jim, Thanks,

Tasha, just tried your office – please give me a call – either #s below – or let me know the best # and time to reach you tomorrow.

Thanks, and look forward to speaking.

Best Regards, Steve  
**J. Stephen Simms | SIMMS SHOWERS LLP**  
D: +1 443-290-8704 | M: +1 410-365-6131  
[jssimms@simmsshowers.com](mailto:jssimms@simmsshowers.com) | [www.simmsshowers.com](http://www.simmsshowers.com)

**From:** James Winton <[svcenturion@outlook.com](mailto:svcenturion@outlook.com)>  
**Sent:** Thursday, October 24, 2024 7:06 PM  
**To:** J. Stephen Simms <[jssimms@simmsshowers.com](mailto:jssimms@simmsshowers.com)>  
**Subject:** Cockett v. Bravo

Mr. Simms, you should expect to receive a phone call from Natasha Revell, Zalkin Revell, PLLC of Santa Rosa Beach, Florida, to explore potential resolution of this matter.

*Jim*

[svcenturion@outlook.com](mailto:svcenturion@outlook.com)

---

**From:** James Winton <svcenturion@outlook.com>  
**Sent:** Monday, October 21, 2024 1:55 PM  
**To:** J. Stephen Simms <jssimms@simmsshowers.com>  
**Subject:** Re: Cockett Marine Oil US, Inc. / Bravo Global Supply LLC

I don't have anything for you at this time. I am working on having our Wilmington office enter an appearance and moving for my admission pro hac vice.

Sent from my iPhone



On Oct 21, 2024, at 06:30, J. Stephen Simms <[jssimms@simmsshowers.com](mailto:jssimms@simmsshowers.com)> wrote:

Jim, what proposal does Chris/ Bravo have for Cockett?

Thanks.

Best Regards, Steve

**J. Stephen Simms | SIMMS SHOWERS LLP**

D: +1 443-290-8704 | M: +1 410-365-6131

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**From:** James Winton <[svcenturion@outlook.com](mailto:svcenturion@outlook.com)>

**Sent:** Friday, October 18, 2024 11:03 AM

**To:** J. Stephen Simms <[jssimms@simmsshowers.com](mailto:jssimms@simmsshowers.com)>

**Cc:** Gary C. Murphy <[gcmurphy@simmsshowers.com](mailto:gcmurphy@simmsshowers.com)>; Catherine M. Benson <[cmbenson@simmsshowers.com](mailto:cmbenson@simmsshowers.com)>; Debra M. Hnat <[dhnat@simmsshowers.com](mailto:dhnat@simmsshowers.com)>

**Subject:** RE: Cockett Marine Oil US, Inc. / Bravo Global Supply LLC

I will discuss it with him.

*Jim*

[svcenturion@outlook.com](mailto:svcenturion@outlook.com)

**From:** J. Stephen Simms <[jssimms@simmsshowers.com](mailto:jssimms@simmsshowers.com)>

**Sent:** Friday, October 18, 2024 9:50 AM

**To:** James Winton <[svcenturion@outlook.com](mailto:svcenturion@outlook.com)>

**Cc:** Gary C. Murphy <[gcmurphy@simmsshowers.com](mailto:gcmurphy@simmsshowers.com)>; Catherine M. Benson <[cmbenson@simmsshowers.com](mailto:cmbenson@simmsshowers.com)>; Debra M. Hnat <[dhnat@simmsshowers.com](mailto:dhnat@simmsshowers.com)>

**Subject:** Fw: Cockett Marine Oil US, Inc. / Bravo Global Supply LLC

Jim, Thanks - like I say, I don't know what Chris/Bravo can do - or would do.

I am just throwing out ideas.

What are Chris'/Bravo's ideas - now - for paying Cockett?

Thanks, Best, Steve 410-365-6131 mobile

---

**From:** James Winton <[svcenturion@outlook.com](mailto:svcenturion@outlook.com)>

**Sent:** Friday, October 18, 2024 10:47 AM

**Exhibit C**

To: J. Stephen Simms <[jssimms@simmsshowers.com](mailto:jssimms@simmsshowers.com)>  
Subject: RE: Cockett Marine Oil US, Inc. / Bravo Global Supply LLC

[REDACTED]

*Jim*

[svcenturion@outlook.com](mailto:svcenturion@outlook.com)

From: J. Stephen Simms <[jssimms@simmsshowers.com](mailto:jssimms@simmsshowers.com)>  
Sent: Friday, October 18, 2024 9:32 AM  
To: James Winton <[svcenturion@outlook.com](mailto:svcenturion@outlook.com)>  
Subject: Re: Cockett Marine Oil US, Inc. / Bravo Global Supply LLC

Jim, Thanks, so what is Chris'/Bravo's proposal?

[REDACTED]

But anyhow, again Chris/ Bravo is aware of his/its financial capabilities, Cockett isn't except for the fact it hasn't been paid. Please give us a proposal we can take back to Cockett.

Best, Steve 410-365-6131 mobile

---

From: James Winton <[svcenturion@outlook.com](mailto:svcenturion@outlook.com)>  
Sent: Friday, October 18, 2024 9:17 AM  
To: J. Stephen Simms <[jssimms@simmsshowers.com](mailto:jssimms@simmsshowers.com)>  
Subject: Re: Cockett Marine Oil US, Inc. / Bravo Global Supply LLC

He is unable to meet your proposed payment schedule, particularly since your attempt to attach funds of GLD&D has badly damaged if not destroyed his ability to do business with them.

Sent from my iPhone

On Oct 18, 2024, at 08:58, J. Stephen Simms <[jssimms@simmsshowers.com](mailto:jssimms@simmsshowers.com)> wrote:

Jim, thanks, before considering answers to your two questions, bottom line, what proposal does Chris have for paying Cockett?

Thanks, Steve 410-365-6131 mobile

On Oct 18, 2024, at 08:41, James Winton <[svcenturion@outlook.com](mailto:svcenturion@outlook.com)> wrote:

Normally I would agree to accept service on behalf of a client but, under the circumstances, I cannot agree to do so here.

As you know, the Court has no personal jurisdiction over Bravo and, as we discussed, I believe that your attachment is invalid because Bravo has no property present within the District. Thus, the Court lacks jurisdiction.

I also believe that certain of the provisions of the Terms and Conditions on which you rely are unenforceable. Those issues will be set out in the proposed answer.

Questions for you:

- Do you intend to oppose our motion for relief from default?
- Will you oppose a motion for my admission pro hac vice?

*Jim Winton*

[svcenturion@outlook.com](mailto:svcenturion@outlook.com)

**From:** J. Stephen Simms <[jssimms@simmsshowers.com](mailto:jssimms@simmsshowers.com)>

**Sent:** Thursday, October 17, 2024 3:51 PM

**To:** 'James Winton' <[svcenturion@outlook.com](mailto:svcenturion@outlook.com)>

**Cc:** Gary C. Murphy <[gcmurphy@simmsshowers.com](mailto:gcmurphy@simmsshowers.com)>; Catherine M. Benson <[cmbe Benson@simmsshowers.com](mailto:cmbe Benson@simmsshowers.com)>; Debra M. Hnat <[dhnat@simmsshowers.com](mailto:dhnat@simmsshowers.com)>

**Subject:** Cockett Marine Oil US, Inc. / Bravo Global Supply LLC

Jim, Good to talk Tuesday and have Chris' letter with your email (below) this afternoon.

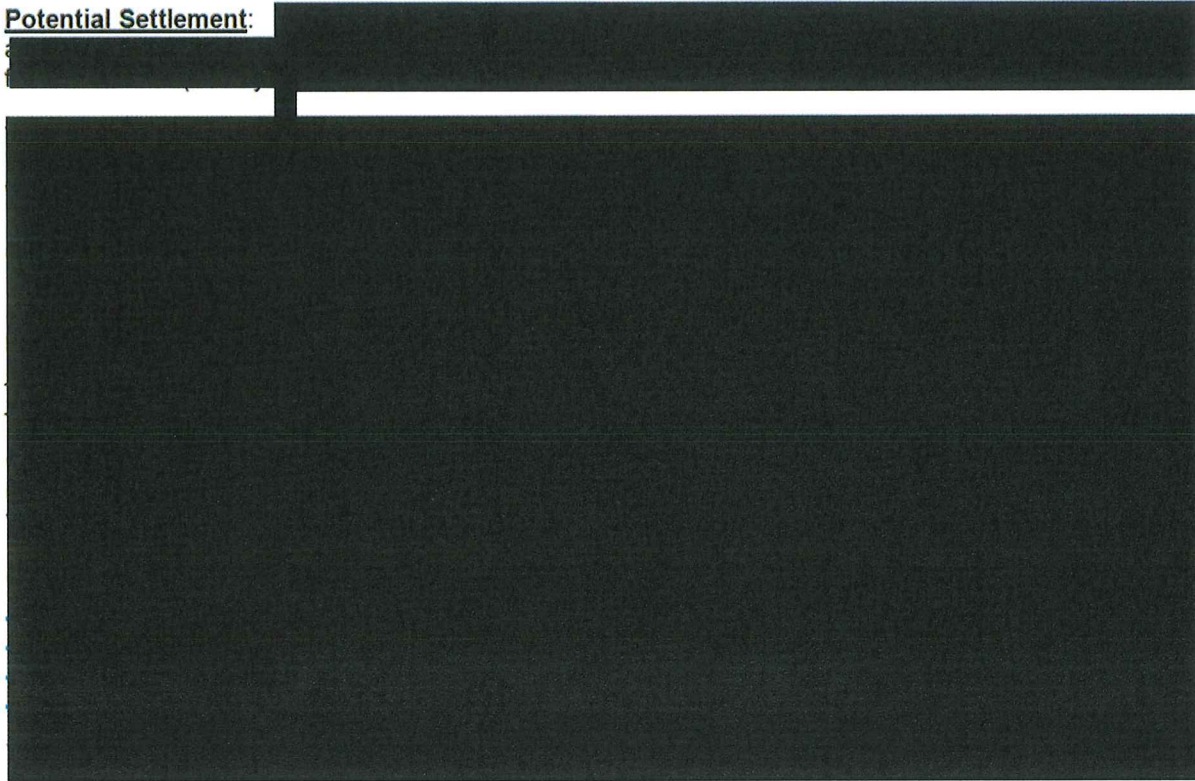
**Service of the default entry** : The Clerk also today asked us to confirm service on Bravo Global of the default entry - although Chris of course has for awhile been aware of the default entry.

We are serving the default entry on Bravo per FRCP 5 but in addition to that, please let me know today if you will accept further service on Bravo, by this email



**Meritorius Defense?** : Now, to vacate the default Bravo will need to show a meritorious defense. What is Bravo's meritorious defense? It would be good to know that before going into more.

**Potential Settlement:**



Again we discussed we don't know Chris/ Bravo's financial situation including (except for Nalex) amounts owed others. There could be settlement at a lesser amount with good security.

Please let us know, if our recommendation doesn't work, what would work for Chris/Bravo.

Best Regards, Steve

**J. Stephen Simms** | **SIMMS SHOWERS LLP**

D: +1 443-290-8704 | M: +1 410-365-6131

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#### BUSINESS ORGANIZATIONS INQUIRY - VIEW ENTITY

|                                 |  |                       |  |
|---------------------------------|--|-----------------------|--|
| <b>Filing Number:</b>           | 803389488  | <b>Entity Type:</b>   | Domestic Limited Liability Company (LLC) |
| <b>Original Date of Filing:</b> | August 7, 2019   | <b>Entity Status:</b> | In existence                             |
| <b>Formation Date:</b>          | N/A  |                       |  |
| <b>Tax ID:</b>                  | 32071570330  | <b>FEIN:</b>          |  |
| <b>Duration:</b>                | Perpetual  |                       |  |
| <b>Name:</b>                    | Bravo Global Supply LLC                                |                       |  |
| <b>Address:</b>                 | 755 MAJESTIC SHORES LN<br>PINEHURST, TX 77362-2020 USA |                       |  |

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| <a href="#">&lt;image001.gif&gt;</a> | 905386250002    | Certificate of Formation             | August 7, 2019    | August 7, 2019 | No        | 5          |
| <a href="#">&lt;image001.gif&gt;</a> | 1135621890001   | Public Information Report (PIR)      | December 31, 2021 | April 1, 2022  | No        | 1          |
| <a href="#">&lt;image001.gif&gt;</a> | 1249411220003   | Certificate of Assumed Business Name | May 22, 2023      | May 22, 2023   | No        | N/A        |

From: [ded nefreply@ded.uscourts.gov](mailto:ded_nefreply@ded.uscourts.gov) <[ded nefreply@ded.uscourts.gov](mailto:ded_nefreply@ded.uscourts.gov)>

Sent: Thursday, October 17, 2024 10:04 AM

To: [ded\\_ecf@ded.uscourts.gov](mailto:ded_ecf@ded.uscourts.gov)

Subject: Activity in Case 1:24-cv-00640-MN Cockett Marine Oil US, Inc. v. Bravo Global Supply LLC et al Oral Order

**This is an automatic e-mail message generated by the CM/ECF system. Please DO NOT RESPOND to this e-mail because the mail box is unattended.**

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U.S. District Court  
District of Delaware

#### Notice of Electronic Filing

The following transaction was entered on 10/17/2024 at 10:03 AM EDT and filed on 10/17/2024

Case Name: Cockett Marine Oil US, Inc. v. Bravo Global Supply LLC et al

Case Number: [1:24-cv-00640-MN](#)

Filer:

Document Number: 39(No document attached)

Docket Text:

**ORAL ORDER - Having reviewed the Clerk's Entry of Default (D.I. [25]) and the submissions accompanying Plaintiff's Motion for Default Judgment (see D.I. [27], [28] & [29]), the Court finds that Plaintiff has not filed proof that it has served a copy of the Clerk's Entry of Default on Defendant Bravo Global Supply LLC as required (D.I. [25] at 2). IT IS HEREBY ORDERED that, on or before October 24, 2024, Plaintiff shall file the requisite proof of service of the Clerk's Entry of Default. ORDERED by Judge Eleanor G. Tennyson on 10/17/2024. (lah)**



**1:24-cv-00640-MN Notice has been electronically mailed to:**

Timothy Jay Houseal [thouseal@ycst.com](mailto:thouseal@ycst.com), [arhoades@ycst.com](mailto:arhoades@ycst.com), [lwatson@ycst.com](mailto:lwatson@ycst.com),  
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Benjamin P. Chapple [bchapple@reedsmith.com](mailto:bchapple@reedsmith.com), [dwitt@reedsmith.com](mailto:dwitt@reedsmith.com),  
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**From:** James Winton <[svcenturion@outlook.com](mailto:svcenturion@outlook.com)>

**Sent:** Thursday, October 17, 2024 2:56 PM

**To:** [thouseal@ycst.com](mailto:thouseal@ycst.com); [bchapple@reedsmith.com](mailto:bchapple@reedsmith.com); [anna.currier@blankrome.com](mailto:anna.currier@blankrome.com); J. Stephen Simms  
<[jssimms@simmsshowers.com](mailto:jssimms@simmsshowers.com)>

**Cc:** [douglas.shoemaker@blankrome.com](mailto:douglas.shoemaker@blankrome.com)

**Subject:** RE: Cockett Marine Oil US, Inc. Bravo Global Supply LLC, et al; Cause No.: 24-cv-640-MN

Bravo Global Supply is sending the attached letter *pro se* to the Court via FedEx. I hope to clear the hurdles to appear in this matter on its behalf shortly.

*Jim*

[svcenturion@outlook.com](mailto:svcenturion@outlook.com)

---

**From:** James Winton

**Sent:** Monday, October 14, 2024 2:15 PM

**To:** [thouseal@ycst.com](mailto:thouseal@ycst.com); [jssimms@simmsshowers.com](mailto:jssimms@simmsshowers.com); [bchapple@reedsmith.com](mailto:bchapple@reedsmith.com);  
[anna.currier@blankrome.com](mailto:anna.currier@blankrome.com)

**Subject:** Cockett Marine Oil US, Inc. Bravo Global Supply LLC, et al; Cause No.: 24-cv-640-MN

I am a retired maritime law partner of BakerHostetler's Houston office. I have been contacted by Chris Brooks of Bravo Global Supply, our son. He has asked me to assist him in the above matter. Because of the terms of the BakerHostetler Partner Agreement, as a retired partner, I am not allowed to practice law without first obtaining the permission of the Policy Committee. I will be requesting such permission and will be asking BakerHostetler's Wilmington office to act as local counsel and to move for my admission in this matter *pro hac vice*.



Please take no further action adverse to the interests of Bravo Global Supply until I have had an opportunity to appear in this matter on its behalf.

*Jim*

[svcenturion@outlook.com](mailto:svcenturion@outlook.com)

<image001.gif>

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**From:** Lyons, Jeffrey J. <jjlyons@bakerlaw.com>

**Sent:** Tuesday, October 22, 2024 4:16 PM

**To:** thouseal@ycst.com; bchapple@reedsmith.com; Anna.Currier@blankrome.com; J. Stephen Simms <jssimms@simmsshowers.com>

**Cc:** James Winton <svcenturion@outlook.com>

**Subject:** FW: Activity in Case 1:24-cv-00640-MN Cockett Marine Oil US, Inc. v. Bravo Global Supply LLC et al Oral Order

Counsel,

Pursuant to the Court's oral order issued earlier today, Jim and I are available for the meet and confer on behalf of Bravo generally tomorrow and Thursday. Please let me know what times work for you all and I can circulate a dial-in.

Best,  
Jeff

**Jeffrey J. Lyons**

He | Him | His  
Associate

**BakerHostetler**

|                                 |                                    |
|---------------------------------|------------------------------------|
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Admitted in Delaware; not admitted in Pennsylvania

From: [ded\\_nefreply@ded.uscourts.gov](mailto:ded_nefreply@ded.uscourts.gov) <[ded\\_nefreply@ded.uscourts.gov](mailto:ded_nefreply@ded.uscourts.gov)>

Sent: Tuesday, October 22, 2024 11:37 AM

To: [ded\\_ecf@ded.uscourts.gov](mailto:ded_ecf@ded.uscourts.gov)

Subject: Activity in Case 1:24-cv-00640-MN Cockett Marine Oil US, Inc. v. Bravo Global Supply LLC et al  
Oral Order

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**U.S. District Court**

**District of Delaware**

### **Notice of Electronic Filing**

The following transaction was entered on 10/22/2024 at 11:37 AM EDT and filed on 10/22/2024

**Case Name:** Cockett Marine Oil US, Inc. v. Bravo Global Supply LLC et al

**Case Number:** [1:24-cv-00640-MN](#)

**Filer:**

**Document Number:** 45(No document attached)

#### **Docket Text:**

**ORAL ORDER - The Clerk previously entered default against Defendant Bravo Global Supply LLC for failing to plead or otherwise defend in this action (D.I. [25]), but Bravo has now made an appearance and filed an Answer (D.I. [41], [43] & [44]). IT IS HEREBY ORDERED that, on or before October 25, 2024, the parties shall meet and confer and file a joint status report indicating (1) the impact, if any, of Bravo's appearance on the pending motions (D.I. [24] & [27]) and (2) whether all parties consent to a magistrate judge's jurisdiction over the pending motions. ORDERED by Judge Eleanor G. Tennyson on 10/22/2024. (lah)**

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